

APR 21 2020

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA, US DISTRICT COURT  
CHARLOTTE DIVISION, WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA	)	Docket No. 3:20-cr- 131-FDW
v.	)	<u>BILL OF INDICTMENT</u>
(1) SAVANNAH LEEANN GOINS	)	Violations:
(2) MARLEE DARE GRIFFITH	)	18 U.S.C. § 2
(3) RYAN ANDREW PRESCOTT	)	18 U.S.C. § 924(c)
(4) JOSEPH MICHAEL VASSEY	)	21 U.S.C. § 841
	)	21 U.S.C. § 846

THE GRAND JURY CHARGES:

COUNT ONE  
(Methamphetamine Trafficking Conspiracy)

From at least as early as in or about 2019 to in or about February 2020, in Gaston County, Lincoln County, and Cleveland County, within the Western District of North Carolina, and elsewhere, the defendants,

- (1) SAVANNAH LEEANN GOINS,
- (2) MARLEE DARE GRIFFITH,
- (3) RYAN ANDREW PRESCOTT, and
- (4) JOSEPH MICHAEL VASSEY,

did knowingly and intentionally conspire and agree with each other and with other persons, known and unknown to the Grand Jury, to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Quantity of Controlled Substances Involved in Count One

It is further alleged that, with respect to the offense charged in Count One, five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, are attributable to, and were reasonably foreseeable by defendants (1) SAVANNAH LEEANN GOINS, (2) MARLEE DARE GRIFFITH, (3) RYAN ANDREW PRESCOTT, and (4) JOSEPH MICHAEL VASSEY, so Title 21, United States Code, Section 841(b)(1)(A) is applicable to them.

**COUNT TWO**  
**(Possession with Intent to Distribute Methamphetamine)**

On or about June 11, 2019, in Lincoln County, within the Western District of North Carolina, and elsewhere, the defendant,

**(1) SAVANNAH LEEANN GOINS,**

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT THREE**  
**(Possession of Firearm in Furtherance of Drug Trafficking)**

On or about June 11, 2019, in Lincoln County, within the Western District of North Carolina, and elsewhere, the defendant,

**(1) SAVANNAH LEEANN GOINS,**

did knowingly possess in furtherance of a drug trafficking crime, that is, possession with intent to distribute a controlled substance, a violation of Title 21, United States Code, Section 841, as charged in Count Two, for which she may be prosecuted in a court of the United States, one or more firearms, in violation of Title 18, United States Code, Section 924(c).

**COUNT FOUR**  
**(Possession with Intent to Distribute Methamphetamine)**

On or about July 25, 2019, in Lincoln County, within the Western District of North Carolina, and elsewhere, the defendant,

**(1) SAVANNAH LEEANN GOINS,**

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FIVE**  
**(Possession with Intent to Distribute Methamphetamine)**

On or about November 19, 2019, in Cleveland County, within the Western District of North Carolina, and elsewhere, the defendants,

- (1) SAVANNAH LEEANN GOINS and  
(2) MARLEE DARE GRIFFITH,**

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and did aid and abet the same, in violation of Title 18, United States Code, Section 2.

**Quantity of Controlled Substances Involved in Count Five**

It is further alleged that, with respect to the offense charged in Count Five, fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, are attributable to, and were reasonably foreseeable by defendants (1) SAVANNAH LEEANN GOINS and (2) MARLEE DARE GRIFFITH, so Title 21, United States Code, Section 841(b)(1)(B) is applicable to them.

**COUNT SIX**  
**(Possession of Firearm in Furtherance of Drug Trafficking)**

On or about November 19, 2019, in Cleveland County, within the Western District of North Carolina, and elsewhere, the defendants,

- (1) SAVANNAH LEEANN GOINS and  
(2) MARLEE DARE GRIFFITH,**

did knowingly possess in furtherance of a drug trafficking crime, that is, possession with intent to distribute a controlled substance, a violation of Title 21, United States Code, Section 841, as charged in Count Five, for which she may be prosecuted in a court of the United States, one or more firearms, in violation of Title 18, United States Code, Section 924(c), and did aid and abet the same, in violation of Title 18, United States Code, Section 2.

**COUNT SEVEN**  
**(Possession with Intent to Distribute Methamphetamine)**

On or about December 11, 2019, in Lincoln County, within the Western District of North Carolina, and elsewhere, the defendant,

**(4) JOSEPH MICHAEL VASSEY,**

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT EIGHT**

**(Distribution of, and Possession with Intent to Distribute, Methamphetamine)**

On or about February 7, 2020, in Lincoln County, within the Western District of North Carolina, and elsewhere, the defendant,

**(2) MARLEE DARE GRIFFITH,**

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**Quantity of Controlled Substances Involved in Count Eight**

It is further alleged that, with respect to the offense charged in Count Eight, fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, are attributable to, and were reasonably foreseeable by defendant (2) MARLEE DARE GRIFFITH, so Title 21, United States Code, Section 841(b)(1)(B) is applicable to her.

**COUNT NINE**

**(Distribution of, and Possession with Intent to Distribute, Methamphetamine)**

On or about February 11, 2020, in Cleveland County, within the Western District of North Carolina, and elsewhere, the defendant,

**(4) JOSEPH MICHAEL VASSEY,**

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**Quantity of Controlled Substances Involved in Count Nine**

It is further alleged that, with respect to the offense charged in Count Nine, fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, are attributable to, and were reasonably foreseeable by defendant (4) JOSEPH MICHAEL VASSEY, so Title 21, United States Code, Section 841(b)(1)(B) is applicable to him.

**COUNT TEN**  
**(Possession with Intent to Distribute Methamphetamine)**

On or about February 17, 2020, in Lincoln County, within the Western District of North Carolina, and elsewhere, the defendants,

**(3) RYAN ANDREW PRESCOTT, and  
(4) JOSEPH MICHAEL VASSEY,**

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), and did aid and abet the same, in violation of Title 18, United States Code, Section 2.

**Quantity of Controlled Substances Involved in Count Ten**

It is further alleged that, with respect to the offense charged in Count Ten, five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, are attributable to, and were reasonably foreseeable by defendants (3) RYAN ANDREW PRESCOTT and (4) JOSEPH MICHAEL VASSEY, so Title 21, United States Code, Section 841(b)(1)(A) is applicable to them.

**NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE**

Notice is hereby given of 21 U.S.C. § 853, 18 U.S.C. § 924, and 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Section 853, 924, and/or 2461(c):

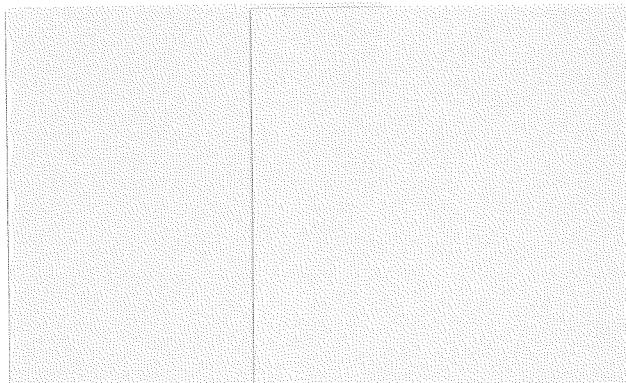
- a. All property which constitutes or is derived from proceeds of the violations set forth in this bill of indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations;

- c. All firearms or ammunition involved or used in such violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), and (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b), and (c).

The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

- One Taurus 9mm handgun model G2C with serial number TLO55389 (stolen), one Tech 9 firearm with serial number 115502, one Beretta .25 caliber handgun with serial number BAS1480V, and ammunition seized on June 11, 2019, during the investigation.
- Approximately \$1,269 in U.S. currency seized on July 25, 2019, during the investigation.
- One Davis Industries .38 caliber Derringer pistol with serial #D068194, one Titan Tiger .38 caliber pistol with serial #0834097, and ammunition seized on November 19, 2019, during the investigation.
- Approximately \$7,661 in U.S. currency seized on February 17, 2020, during the investigation.

A TRUE BILL:



R. ANDREW MURRAY  
UNITED STATES ATTORNEY

A handwritten signature of R. Andrew Murray.

STEVEN R. KAUFMAN  
ASSISTANT UNITED STATES ATTORNEY